

PRESENTMENT DATE AND TIME: July 19, 2011 at 12:00 noon (Eastern Time)

OBJECTION DEADLINE: July 19, 2011 at 11:30 a.m. (Eastern Time)

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re :

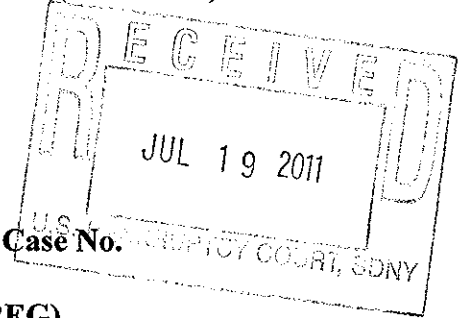
MOTORS LIQUIDATION COMPANY, et al., :  
f/k/a General Motors Corp., et al. :

Debtors. :  
-----X

**Chapter 11 Case No.**

**09-50026 (REG)**

**(Jointly Administered)**



**RYAN HAWKINS, AS PERSONAL REPRESENTATIVE OF THE ESTATE OF  
BARBARA HAWKINS, OBJECTION TO THE  
ORDER GRANTING MOTORS LIQUIDATION  
COMPANY GUC TRUST'S OBJECTION TO CLAIM  
NOS. 39218, 39219, 39220, 39221, AND 39222 FOR FAILURE TO COMPLY  
WITH AMENDED ORDER PURSUANT TO 11 U.S.C. § 105(A) AND GENERAL  
ORDER M-390 AUTHORIZING IMPLEMENTATION OF ALTERNATE  
DISPUTE PROCEDURES, INCLUDING MANDATORY MEDIATION**

PLEASE TAKE NOTICE that RYAN HAWKINS, AS PERSONAL REPRESENTATIVE  
OF THE ESTATE OF BARBARA HAWKINS, files this objection to the Order granting Motors  
Liquidation Company GUC Trust (the "GUC Trust") Objection to Claim Nos. 39218, 39219, 39220,  
39221 and 39222.

PLEASE TAKE FURTHER NOTICE that neither Donald N. Watson nor Tanisha Gary,  
claimant's counsel, personally received the Objection to Allowance to Proof of Claims, dated May  
10, 2011.

PLEASE TAKE FURTHER NOTICE that, neither Donald N. Watson nor Tanisha Gary,  
claimants' counsel, personally received notice of the hearing on the Objection scheduled for June  
22, 2011. The undersigned apologizes for the lack of attendance at the hearing.

PLEASE TAKE FURTHER NOTICE that on or about June 29, 2011, claimant's counsel contacted counsel for GUC's Trust and the law firms together attempted to contact the Court.

PLEASE TAKE FURTHER NOTICE that on or about June 30, 2011, claimant's counsel spoke by telephone with a Court Deputy from the Judge's chambers.

PLEASE TAKE FURTHER NOTICE that claimant's counsel's failure to comply with the ADR Order and ADR Procedures are because of a lack of cooperation from the claimant/personal representative.

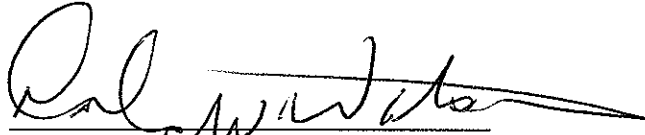
PLEASE TAKE FURTHER NOTICE that claimant's counsel communicated with claimant on several occasions regarding the mandatory mediation; however, claimant refused to attend.

PLEASE TAKE FURTHER NOTICE that claimant's counsel also communicated to claimant that failure to attend the mediation could result in sanctions, including expungement of the claims. The claimant/personal representative has been fully informed but has failed to respond to our attempts to conduct the mediation. There are irreconcilable differences between the claimants' counsel and the claimant/personal representative.

PLEASE TAKE FURTHER NOTICE that claimant's counsel objects to the Court's order expunging claimant's claims and respectfully request that the claims be reinstated and an Order entered allowing the claimant/personal representative a period of ninety (90) days to obtain new counsel on behalf of the claimants.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by regular mail and facsimile (212) 310-8007 this 18<sup>th</sup> day of July, 2011, to Harvey R. Miller, Stephen Karotkin, Joseph H. Smolinsky, WEIL, GOTSHAL & MANGES LLP, 767 Fifth Avenue, New York, New York 10153.

A handwritten signature in black ink, appearing to read "Donald N. Watson", written over a horizontal line.

DONALD N. WATSON, ESQ.

Florida Bar No.: 324442

Attorneys for Plaintiffs

GARY, WILLIAMS, FINNEY, LEWIS,

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